

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ALSAFI DJABERT and KHADIDJA MALLA,)	
)	
Plaintiffs,)	
)	
v.)	Case No:
)	
RYDER TRUCK RENTAL, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF NYRON JEALALL

I, Nyron Jealall, being first duly sworn on oath, under penalties as provided by law pursuant to the Federal Rules of Civil Procedure, certify that the statements set forth herein are true and correct and that, if called upon to testify in the above-captioned case, I could competently testify to the following statements based upon my personal knowledge.

1. I am the Claims Manager for the HL Motor Group, Inc., also known as Highlight Holdings Inc. ("Highlight"), a trucking company located in Ontario, Canada.

2. In my position as Highlight's Claims Manager, I have become familiar with the history, organization and activities of Highlight, a company that is engaged in the trade or business of providing transportation, warehousing and distribution services.

3. Highlight is a company that is organized and existing under the laws of Ontario, Canada.

4. Highlight's principal place of business is located in Ontario, Canada.

5. Highlight's offices and distribution center are located in Ontario, Canada.

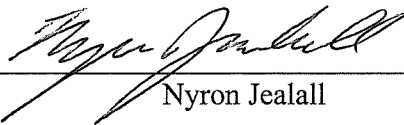
6. In my position as Highlight's Claims Manager, I am also familiar with Highlight's corporate records and documents, which include records of Highlight's ownership and leasing of commercial trucking vehicles and records related to transportation and delivery.

7. I have reviewed the Complaint in this matter, which generally alleged that the plaintiffs suffered personal injuries resulting from a January 23, 2019 motor vehicle collision with a vehicle operated by “Evaristo Y. Santana” and owned by Ryder Truck Rental.

8. On January 23, 2019, while engaged in the activity described in the Complaint in this matter, (Yiguy) Evaristo Santana was an employee of Highlight.

9. I reviewed Highlight’s records and found that the vehicle operated by Mr. Santana at the time of the January 23, 2019 motor vehicle accident described in the Plaintiff’s Complaint, was owned by Ryder Truck Rental and leased by that company to Highlight.

10. Other than doing business with one another, Ryder Truck Rental is not a subsidiary, division or parent company, or in any way affiliated with Highlight.



Nyron Jealall